UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MARYLAND Baltimore Division

IN RE:

JEROME LOVECE SANDERS * Case No.: 09-34487-NVA

*

Debtor * Chapter 13

*

TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO SELL

Gerard R. Vetter, Chapter 13 Trustee in the above-captioned case, objects herein to Debtor's Motion to Sell (Document No. 17) and for reasons states:

- 1. The Debtor has failed to provide sufficient information and documentation regarding the sale of the property, including an appraisal or a current market analysis of the real property showing whether the contract sale price is fair.
- 2. In addition, the proposed sale price of \$491,000.00 is substantially less than the scheduled value of \$575,000.00
- 3. The Trustee requests that the Court direct the Debtor to amend his request to provide the current market value of the real property (supported by a current appraisal or market analysis).
- 4. Without this information and documentation, the Trustee is unable to make a reasoned decision as to the impact of the sale of real property on the bankruptcy estate.

WHEREFORE, the Chapter 13 Trustee requests that this Court deny Debtor's Motion to Sell (Document No. 17) unless the Debtor provides sufficient information and documentation regarding the sale of the real property.

Respectfully submitted,

Dated: March 25, 2010 /s/Gerard R. Vetter

Gerard R. Vetter Chapter 13 Trustee

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CERTIFICATE OF SERVICE

I hereby certify that the aforegoing Objection was served on March 25, 2010 electronically to those recipients authorized to receive a Notice of Electronic Filing by the Court, and/or by first class mail, postage prepaid to:

Jerome Lovece Sanders 11 N. Eutaw Street, Apt. 723 Baltimore, Md 21201

Robert Grossbart, Esquire 1 North Charles Street, Suite 1214 Baltimore, Md 21201-3720 Counsel for Debtor

> <u>/s/ Gerard R. Vetter</u> Gerard R. Vetter